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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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: Chapter 11 In re: :

: Case No. 24-10669

ERICA ITZHAK, :

Debtor. :

SECOND UNOPPOSED MOTION PURSUANT TO BANKRUPTCY RULE 4007(c) TO FURTHER EXTEND THE DEADLINE TO OBJECT TO DEBTOR'S DISCHARGE

On October 15, 2024, this Court signed an order to extend the deadline of Creditor and Interested Party, Jossef Kahlon ("Mr. Kahlon") by which Mr. Kahlon is required to file a complaint under Section 523(c) of Title 11 of the United States Code (the "Bankruptcy Code") to determine the dischargeability of a debt owed to Mr. Kahlon by the chapter 11 Debtor in the above-entitled action, Erica Yitzhak. ("Debtor" or "Ms. Yitzhak") to January 6, 2025. See ECF No. 66. As set forth in the related motion, the extension was necessary to facilitate settlement discussions between the parties. See ECF No. 64.

On January 6, 2025, Mr. Kahlon filed an unopposed consent motion to further extend the deadline by two weeks to January 20, 2025 because settlement discussions were still on going. *See* ECF No. 74.

The parties' settlement discussions are still underway. On January 16, 2025, Ms. Yitzhak

provided through counsel a written settlement offer to Mr. Kahlon. Mr. Kahlon is currently

reviewing that proposal with his counsel.

On January 18, 2025, in light of the pending settlement proposal, undersigned counsel (Mr.

Wang) asked Ms. Yitzhak's chapter 11 counsel, Scott Markowitz, to consent to another two-week

extension, to February 3, 2025. Mr. Markowitz agreed to stipulate to this extension.

The request is being styled as a motion as opposed to a stipulation to comply with the literal

language of Bankruptcy Rule 40007(c). Mr. Kahlon respectfully submits that request should be

granted under the circumstances.

Mr. Kahlon therefore requests that the deadline be extended to February 3, 2025.

Dated: January 18, 2025

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).